

1 JANET M. HEROLD
2 Regional Solicitor
3 SUSAN SELETSKY (CA # 176106)
4 Chief Counsel for FLSA Litigation
5 LAURA C. BREMER
6 Senior Trial Attorney (CA # 162900)
7 TARA STEARNS
8 Trial Attorney (CA # 291130)
9 DAVID EDELI
10 Trial Attorney (CA # 288536)
11 Office of the Solicitor
12 United States Department of Labor
13 90 7th Street, Suite 3-700
14 San Francisco, California 94103
15 Direct: (415) 625-7741
16 Facsimile: (415) 625-7772
17 Email: stearns.tara.e@dol.gov

18 Attorneys for Plaintiff
19 United States Department of Labor

20 UNITED STATES DISTRICT COURT
21 DISTRICT OF NEVADA

22 **R. ALEXANDER ACOSTA**, Secretary of Labor,) **Case No.** 2:16-cv-02353-GMN-GWF
23 United States Department of Labor,)
24)
25 Plaintiff,)
26)
27 v.)
28)
29) **STIPULATION FOR EXTENSION OF**
30 **WELLFLEET COMMUNICATIONS LLC**, a Neva-) **TIME TO FILE MOTION IN RESPONSE**
31 da Limited Liability Company; **NEW CHOICE**) **TO FIRST AMENDED COMPLAINT**
32 **COMMUNICATIONS, INC**, a Nevada corporation;) **AND BRIEFING SCHEDULE**
33 **LIGHTHOUSE COMMUNICATIONS, LLC**, a Ne-) **(First Request)**
34 vada Limited Liability Company; **ALLEN ROACH**,)
35 an individual; and **RYAN ROACH**, aka **RYAN**)
36 **LORE**, an individual;)
37 Defendants.)
38)
39)

1 Plaintiff R. Alexander Acosta, Secretary of Labor, United States Department of Labor, and de-
2 fendants Wellfleet Communications, LLC and Allen Roach, through their undersigned counsel, hereby
3 stipulate and agree to the following extensions of time: The Secretary filed a First Amended Complaint
4 on September 18, 2017. Wellfleet and Allen Roach's responsive pleading is due October 2, 2017, and
5 they plan to file a motion as their responsive pleading. Because the parties are engaged in other motion
6 practice and discovery, they agree that Wellfleet and Roach's responsive motion shall be due **October**
7 **10, 2017**, and the Plaintiff's opposition shall be due **November 7, 2017**. This is the first requested ex-
8 tension of time.

9 Dated: October 2, 2017
10

11 /s/ Tara Stearns
12 Tara Stearns (CA SBN 291130)
13 Office of the Solicitor
14 U.S. Department of Labor
15 90 7th Street, Suite 3-700
16 San Francisco, CA 94103
17 Tel: 415-625-7757
18 stearns.tara.e@dol.gov
19 Attorney for Plaintiff Secretary of Labor

20 /s/ Malani Kotchka
21 Malani Kotchka (SBN 0283)
22 Hejmanowski & Mcrea, LLC
23 520 South Fourth Street, Suite 320
24 Las Vegas, NV 89101
25 Tel: 702-834-8777
26 mlk@hmlawlv.com
27 Attorney for Defendants Wellfleet Communications,
28 LLC and Allen Roach

20 **ORDER**

21
22 **IT IS SO ORDERED:**
23

24
25 
26 UNITED STATES MAGISTRATE JUDGE
27

28 DATED: October 3, 2017